

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>GOFF GROUP, INC., et al,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 2:06cv389-SRW</b>
	)	
<b>PHOENIX-DURANGO, LLC, et al,</b>	)	
	)	
<b>Defendants/</b>	)	
<b>Counterclaim Plaintiffs,</b>	)	
	)	
<b>CAMERON M. HARRIS &amp; CO., INC.,</b>	)	
<b>et al.,</b>	)	
	)	
<b>Counterclaim Defendants.</b>	)	

**ANSWER OF THE UNITED STATES OF AMERICA**  
**[INTERNAL REVENUE SERVICE]**

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Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, on behalf of the United States of America, Department of the Treasury, Internal Revenue Service (Service), as one of the Counterclaim Defendants in this matter; and in answer to the Counterclaim of Phoenix Durango, LLC states as follows:

1. The United States of America admits the jurisdiction of this Court and that it is one of the Counterclaim Defendants in this litigation.
2. The United States of America admits that it has recorded Notices of Federal Liens against Goff NBA, Inc. currently known as the Goff Group, Inc., the Plaintiffs in this matter. The tax liens were filed on November 18, 2004, May 17, 2006, and June 14, 2006 with the Office of the Secretary of State, State of Alabama.
3. The United States of America admits that if Phoenix-Durango succeeds on its claim of judicial foreclosure that the United States of America is entitled to receive any

proceeds that might be available to it according to its level of seniority with respect to any other liens holders.

4. None of the other allegations in the Counterclaim are directed toward the United States of America and, therefore, no response appears to be required from it as to those additional allegations. To the extent that any such response is required, the United States of America is without sufficient information to admit or deny such allegations and demands strict proof thereof.

Respectfully submitted this the 10th day of July, 2006.

LEURA G. CANARY  
United States Attorney

Telephone: (334) 223-7280  
Facsimile: (334) 223-7201

/S/ Patricia Allen Conover  
PATRICIA ALLEN CONOVER  
ASB 2214 R64P  
Assistant United States Attorney  
Post Office Box 197  
Montgomery, Alabama 36101-0197  
[Patricia.Conover@usdoj.gov](mailto:Patricia.Conover@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 10th day of July, 2006, I caused to be served a copy of the foregoing document, Answer of the United States of America, by the methods indicated, upon the following:

AAA Groundkeepers  
3211 Le Bron Road  
Montgomery, AL 36106  
[U. S. Postal Service]

Companion Property & Casualty  
Insurance Company  
c/o James F. Garrett  
Registered Agent  
184 Commerce Street  
Montgomery, AL 36104  
[U.S. Postal Service]

Michael J. Ernst  
Stokes, Lazarus & Carmichael, LLP  
80 Peachtree Park Drive, NE  
Atlanta, GA 30309-1320  
[U.S. Postal Service]

Greenwich Insurance Company  
c/o S. David Parsons, Commissioner,  
Registered Agent for Greenwich  
Alabama Department of Insurance  
201 Monroe Street, Suite 1700  
Montgomery, AL 36130-3351  
[U.S. Postal Service]

Lewis Hickman  
915 S. Hull Street  
Montgomery, AL 36104  
[U.S. Postal Service]

Kemmons Wilson, Inc.  
CSC Lawyers Incorporating  
Service, Inc.  
Registered Agent  
150 Perry Street  
Montgomery, AL 36104  
[U.S. Postal Service]

MBNA American Bank  
MBNA American Bank (Delaware)  
1100 North King Street  
Wilmington, DE 19884  
[U.S. Postal Service]

Meadow Brook North, LLC  
3595 Grandview Parkway, Suite 400  
Birmingham, AL 35243-1930  
[U.S. Postal Service]

State of Alabama  
Office of the Attorney General  
Alabama State House  
11 South Union Street  
Montgomery, AL 36130  
[U.S. Postal Service]

Stuart Allan & Associates, Inc.  
CSC Lawyers, Incorporating  
Service, Inc.  
Registered Agent  
150 Perry Street  
Montgomery, AL 36104  
[U.S. Postal Service]

Willis of North America  
The Corporation Trust Company  
Registered Agent  
1209 Orange Street  
Wilmington, DE 19801  
[U.S. Postal Service]

Via Electronic filing upon the following:  
  
Jason James Baird,  
[jbaird@slatenlaw.com](mailto:jbaird@slatenlaw.com),  
[jwindham@slatenlaw.com](mailto:jwindham@slatenlaw.com)

Clyde Ellis Brazeal, III,  
[ebrazeal@walstonwells.com](mailto:ebrazeal@walstonwells.com)  
[tmoody@walstonwells.com](mailto:tmoody@walstonwells.com)

Issac Ripon Britton, Jr.,  
[rbritton@handarendall.com](mailto:rbritton@handarendall.com)

Donald Christopher Carson,  
[ccarson@burr.com](mailto:ccarson@burr.com)  
[kweaver@burr.com](mailto:kweaver@burr.com)

Winston Whitehead Edwards,  
[wedwards@crdlawform.com](mailto:wedwards@crdlawform.com)

Thomas T. Gallion, III,  
[mp@hsy.com](mailto:mp@hsy.com)  
[ttg@hsy.com](mailto:ttg@hsy.com)

David Cushing Hilyer,  
[dhilyer@crdlawfirm.com](mailto:dhilyer@crdlawfirm.com)

/S/ Patricia Allen Conover  
PATRICIA ALLEN CONOVER  
Assistant United States Attorney  
[Patricia.Conover@usdoj.doj](mailto:Patricia.Conover@usdoj.doj)